

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In RE: Leonard S. Bergman Michele J. Bergman Debtors	Case No.: 20-12276- MDC Chapter 13
Kenneth E. West, Esq. Chapter 13 Trustee Movant	Hearing Date: 12/14/2023 Hearing Time: 09:30 A.M.

DEBTOR'S RESPONSE TO TRUSTEE MOTION TO DISMISS

To the Honorable Judges of the United States Bankruptcy Court for the Eastern of Pennsylvania:

The Debtors in this matter, Leonard S. Bergman and Michele J. Bergman, by counsel, responds to the Trustee's Motion to Dismiss as follows:

1. Trustee's Motion is admitted in part and denied in part. It is admitted said payments have not been in strict compliance with 11 U.S.C. § 1326.
2. Debtor did temporarily miss some payments. Debtor resumed payments and will continue to make them.
3. Debtor will then submit regular plan payments as they become due.

WHEREFORE, Debtor prays that the Trustee's motion be dismissed.

Date: 11/27/2023

/s/ Robert N. Kim
Robert N. Kim, Esquire
Attorney ID #323856
Attorney for Debtors
Legal Aid of Southeastern PA
1230 Veterans Hwy., Box 809
Bristol, PA 19007
(215) 781-1111 / (215) 781-1116 fax
rkim@lasp.org